

PEPER, MARTIN, JENSEN, MAICHEL AND HETLAGE

ATTORNEYS AT LAW

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March 21, 1991

RECEIVED

MAR 22 1991

RCOM SECTION

VIA FEDERAL EXPRESS

Mr. Michael Sanderson, Chief
RCRA Branch
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, KS 66101

Re: Steelcote Manufacturing Company

Dear Mr. Sanderson:

Enclosed is a description of corrective actions taken and a schedule for completion of other corrective actions to be taken by Steelcote Manufacturing Company in response to EPA's March 6, 1991 RCRA notice of violation.

Please feel free to contact me if you have any questions or require additional information.

Very truly yours,

Alphonse McMahon

Alphonse McMahon

AM/gm

Encl.

cc: Douglas A. Niedt (w/encl.)
Jim Moore (w/encl.)



R00353100

RCRA RECORDS CENTER

Response of Steelcote Manufacturing Company
to March 6, 1991 RCRA Notice of Violation

3/21/91

The headings used herein correspond to the descriptions used by the EPA inspector when he filled out the Notice of Violation. The use of these headings is for convenience of reference only and should not be construed as an admission that a violation of RCRA or any regulation promulgated thereunder occurred.

In addition, this response should not be construed as an admission that a violation of RCRA or any regulation promulgated thereunder occurred.

1. Failure to prevent unknown entry to still area

The still area is accessible via a gate made of steel bars. During normal working hours (7:00 a.m. to 3:30 p.m.), the gate is unlocked. However, two security guards work in an area directly across from the gate and have an unobstructed view of the gate.

Between 3:30 p.m. and 7:00 p.m. the next working day, the gate is locked with a padlock. In addition, during these hours a passive electronic beam is activated. This beam, which is connected to ADT, a security firm, crosses the yard where the still is located and will sound an alarm if broken.

Steelcote does not believe that any additional measures are required by the regulations.

2. "No Smoking" signs not installed

The inspector did not see the "No Smoking" sign by the distillation unit. This sign was there during the inspection. It is held by a single wire, and when the wind gets hold of it, it can twist. However, the only people allowed in this area are aware of our "No Smoking" policy.

By March 22, 1991, Steelcote will adjust the existing sign so that it cannot be twisted by the wind. In addition, by March 22, 1991, Steelcote will order an additional "No Smoking" sign. It will be installed at the entrance to the still area.

3. Open Containers

The five or so drums referred to were located in the "tin shed". Each of these drums contains off-spec product. Each has already been closed. In addition, see the response to item 9.

4. Inadequate aisle space

After the inventory of drums in the tin shed described in the response to item 9 has been completed, any drum containing hazardous waste will be disposed of. No hazardous waste will be stored in the tin shed.

5. Containers not protected from accumulated liquids

By March 29, 1991, Steelcote will place pallets in the two hazardous waste storage areas to elevate the drums above the floor.

6. Ignitable waste stored less than 50 feet from the property line

On March 18, 1991, the Fire Marshall for the City of St. Louis, Missouri inspected the two hazardous waste storage areas and still area, and approved the presence of ignitable materials in these areas. He told Steelcote that he will send a letter confirming this. Upon receipt of this letter, Steelcote will forward a copy to EPA.

7. Over 55 gallons stored at satellite accumulation point, one 55 gallon container stored over one year

The two drums at the satellite accumulation point have both been moved to a hazardous waste storage area. They will be handled and disposed of in accordance with regulations.

The container that was dated 2/28/90 was mislabeled. The employee who filled in the date on the hazardous waste label and affixed the label to the drum did so in 1991, not 1990. Thus, the drum had only been at the accumulation area for a week or so at the time of the inspection, not a year. This is supported by the fact that this drum was almost empty.

8. Inadequate fire and spill control equipment and water supply

Currently, a fire extinguisher is located in the varnish plant office, near the still area. By March 29, 1991, Steelcote will install an additional fire extinguisher in the still area.

By March 29, 1991, Steelcote will purchase and place near the two hazardous waste storage areas and the still area an appropriate amount of absorbent material that can be used to control spills.

A fire hydrant is currently located outside within 20 feet of the outside storage area, which would supply an adequate volume of water. In addition, both hazardous waste storage areas have a water sprinkler system installed above them. Steelcote will have the sprinkler system extended over the still area as soon as possible, but by no later than April 30, 1991.

9. Failure to make hazardous waste determination

This refers to drums of material in the tin shed. This material is either raw material, finished product, or off-spec product. To address these drums, Steelcote will implement the following procedure:

- A. By March 29, 1991, Steelcote will visually inventory the drums in the tin shed to determine which are (i) dry, non-flammable raw material, (ii) flammable raw material, (iii) finished product, or (iv) other. Drums in categories (ii) and (iii) will be moved to other raw material and finished product storage areas, respectively, in the plant.
- B. Steelcote will test category (iv) drums to determine whether or not this material can be used in a Steelcote product. This testing will be completed by May 31, 1991. Any material found to be unusable will be disposed of properly as hazardous waste.
- C. The tin shed will thereafter be used for storage of category (i) material.

10. Storage of hazardous waste over 90 days and failure to comply with the requirements for interim status or permit

The drum incorrectly labeled "1990" has been discussed above in the response to item 7.

The contents of the two drums in the tin shed with hazardous waste labels dated 1986 will be distilled on-site by March 25, 1991 and the still bottoms will be properly disposed of as hazardous waste.

11. Failure to comply with the air emission standard for equipment leaks

Every Wednesday, the still area is inspected. The previous Wednesday, February 27, 1991, no leak was observed on the distillation unit. The inspector saw this leak on Wednesday, March 6, 1991, our normal day of inspection. This leak has been repaired, and no further leakage is occurring.

12. Facility not operated to minimize the possibility of an emergency

Both hazardous waste storage areas are diked with concrete bricks which are lined with a chemical resistant coating to contain any spill that might occur. Telephones (located in each part of the plant, including approximately three feet away from the outside storage area, near the still area, and 15 feet from the basement storage area) are available to call fire and emergency numbers. Fire extinguishers (located throughout the plant, including approximately three feet away from the outside storage area, near the still area, and 15 feet from the basement storage area) are available if needed. Both hazardous waste storage areas are covered by sprinklers.

To further minimize the possibility of an emergency, Steelcote will install a sprinkler system in the distillation room as quickly as possible, but by no later than April 30, 1991. Also, by March 29, 1991, Steelcote will install a fire extinguisher in the still area.

1068E

A photograph of a construction site. In the foreground, a red plastic safety fence is strung across the frame. Behind the fence is a large area of light-colored gravel. To the right, a dark brick wall runs along the edge of the site. In the background, a white building with a roll-up door is visible. A wheelbarrow stands near the white building. The ground in the far background appears to be covered in reddish-brown material, possibly dirt or mulch.



HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE, OR
PUBLIC SAFETY AUTHORITY, OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY
Waste Management Division

PROPER D.C.T. SHIPPING NAME: Flammable Liquid UN OR NA# 1263
GENERATOR INFORMATION:
NAME: St. Louis Mo. Co.
ADDRESS: One Steeplecote Dr. STATE: MO ZIP: 63103
CITY: St. Louis
EPA ID NO: MOBERCK75036 EPA WASTE NO: Ec03/000/10001
ACCUMULATION MANIFEST
START DATE: 2-28-90 DOCUMENT NO. _____

HANDLE WITH CARE!
CONTAINS HAZARDOUS OR TOXIC WASTES

DOT-4000.6

Printed on 4000-100-01-01, 11/87. © HAZARDOUS LABORATORY, LTD. HAZWASTE 4, 1988

Photo #: 01 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Area where tank was removed

KS

Photo #: 02 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: > 55-gallons in satellite storage

KS

Photo #: 03 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: > 55-gallons in satellite storage -
drum label

KS

4th FLOOR CHARLIE VANCIL 2-10

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

Waste Paint related material
Flammable Liquid UN OR HM 1263
Contains xylene & toluene

PROPER D.O.T. SHIPPING NAME

GENERATOR INFORMATION

NAME: Steelcase Mfg. Co.

ADDRESS: One Steelcase Sq.

CITY: St Louis STATE: MO 63103

EPA ID NO: M00006275036 EPA WASTE NO: F003/F005/0001

ACCUMULATION START DATE: 11-9-91

MANIFEST DOCUMENT NO:

HANDLE WITH CARE!
CONTAINS HAZARDOUS OR TOXIC WASTES

Printed by LABELMASTER, Inc. 30 AMERICAN LABEL-9000-100

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

Waste Paint Related material
Flammable liquid
Contains xylene & toluene

PROPER D.O.T. SHIPPING NAME

GENERATOR INFORMATION

NAME: Steelcase Mfg. Co.

ADDRESS: One Steelcase Sq.

CITY: St Louis STATE: MO 63103

EPA ID NO: M00006275036 EPA WASTE NO: F003/F005/0001

ACCUMULATION START DATE: 11-9-91

MANIFEST DOCUMENT NO:

HANDLE WITH CARE!
CONTAINS HAZARDOUS OR TOXIC WASTES



4th Floor VANCIL 11-91

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

Waste Paint Related material
Flammable Liquid UN OR HM 1263
Contains xylene & toluene

PROPER D.O.T. SHIPPING NAME

GENERATOR INFORMATION

NAME: Steelcase Mfg. Co.

ADDRESS: One Steelcase Square

CITY: St Louis STATE: MO 63103

EPA ID NO: M00006275036 EPA WASTE NO: F003/F005/0001

ACCUMULATION START DATE: 11-29-90

MANIFEST DOCUMENT NO:

HANDLE WITH CARE!
CONTAINS HAZARDOUS OR TOXIC WASTES

Printed by LABELMASTER, Inc. 30 AMERICAN LABEL-9000-100



SHOCK V33000 000

North Carolina 1-800-421-4662

Q 16 H
X7777

Photo #: 3A Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: > 55-gallons in satellite storage -
drum label

58

Photo #: 04 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: > 90 day storage in generator storage
area - drum label dated 12/3/90

K9

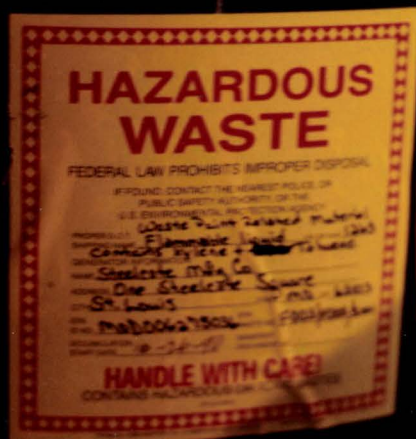
Photo #: 05 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: > 90 day storage in generator storage
area - drum label dated 11/29/90

K9

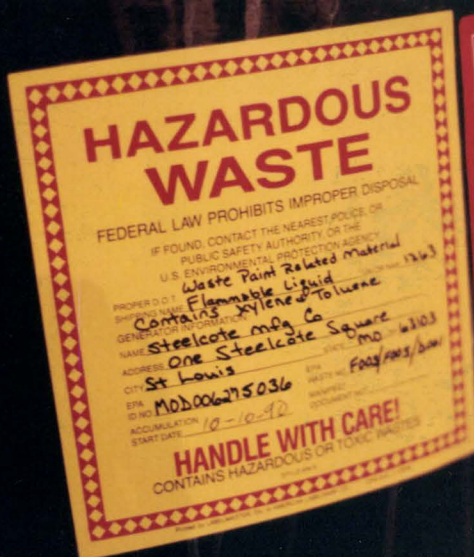
Q 16 H
X7777

Q 16 H
X7777

SHOCKE V3000 090



9 1 3 6



9 1 3 6



9 1 3 6

North Carolina
1-800-421-4662

Photo #: 06 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: > 90 day storage in generator storage
area - drum label dated 10/26/90

K9

Photo #: 07 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: > 90 day storage in generator storage
area - drum label dated 10/10/90

K9

Photo #: 08 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Tanks and mixer containing old roofing
compound

K9



Stocks Version 999

North Carolina
1-800-421-4062

Photo #: 09 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Returned product

K9

Photo #: 10 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Returned product

K9

Photo #: 11 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Waste residue in 80-gallon paint
mixing/transfer kettle

K9

SHOCKS VISION 000



1-800-424-4662
AUGUST 1991

Photo #: 12 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Waste residue in 80-gallon paint
mixing/transfer kettle

KG

Photo #: 13 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: 1/3 full, 80-gallon paint
mixing/transfer kettle in varnish room

KG

Photo #: 14 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Drums in varnish room

KG



SHOCK V33000 000

1-800-421-4062
Nashua, NH 03063

Photo #: 15 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Drums in varnish room

KG

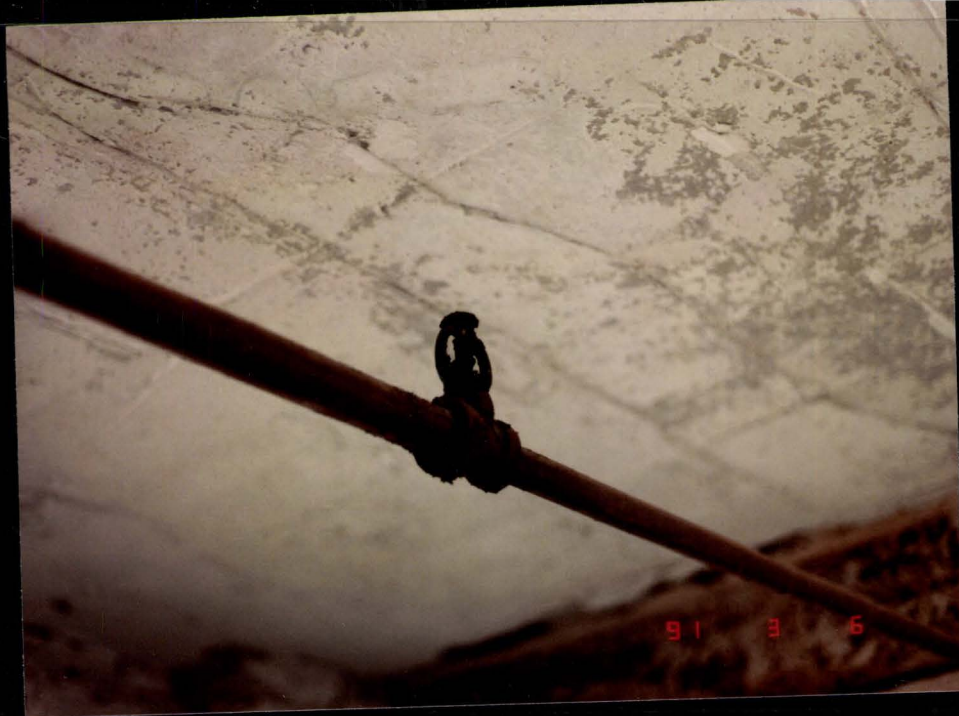
Photo #: 16 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Drums in varnish room

KG

Photo #: 17 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Sprinkler head in outside storage
area

KG

Stocks Vietnam 000



Agencja Fotograficzna
1-800-421-4662

Photo #: 18 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Sprinkler head in outside storage
area

KG

Photo #: 19 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Leak in still feed line
(note small droplets)

KG

Photo #: 20 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Leak in still feed line
(note small droplets)

KG

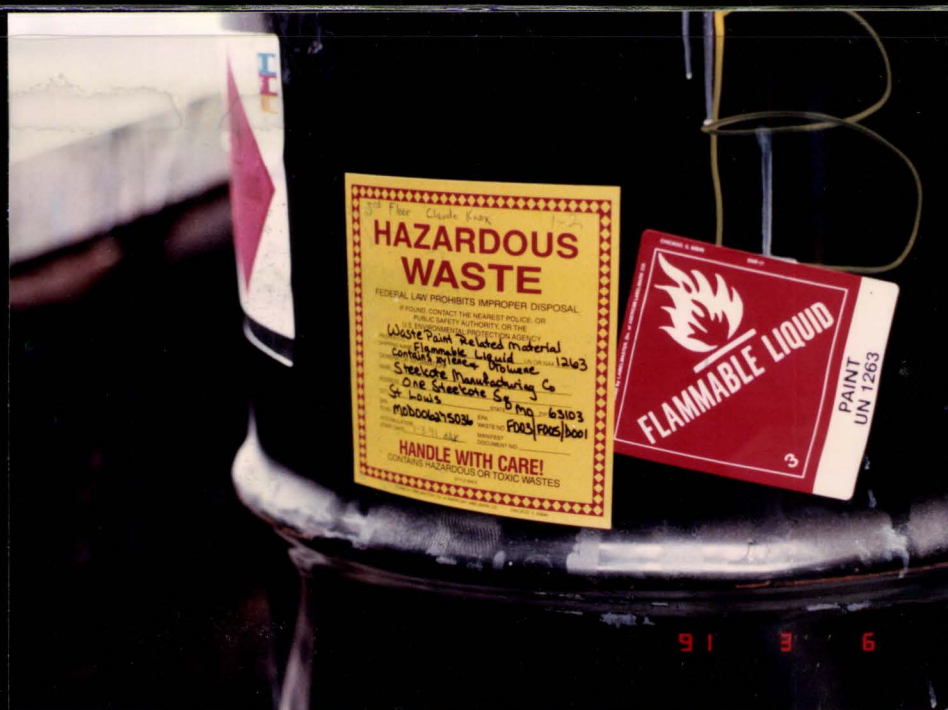


Photo #: 21 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Label on drum which leaking pump/line
was connected, which feeds the still

MAR 16 1991
MAR 16 1991

KG

Photo #: 22 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Drum bottoms dumped on cardboard near
the still area, D001, F003, & F005 wastes

MAR 16 1991

KG

Photo #: 23 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Open container in which the still
bottoms are put into

KG



SHOCKS VIDEO 000

North Carolina
1-800-421-4662

Photo #: 24 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Open hole in still room which shows
evidence of past spills

K9

Photo #: 25 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Dumped/open drum of paint and other
manufacturing wastes in courtyard

K9

Photo #: 26 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Dumped/open drum of paint and other
manufacturing wastes in courtyard

K9



ENCLOSURE 000000000000

ENCLOSURE 000000000000
1-800-421-4662

Q 16 H
KODAK SAFETY FILM

Photo #: 27 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Evidence of past spills of paint wastes
in courtyard

KS

Q 16 H
KODAK SAFETY FILM

Photo #: 28 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Evidence of past spills of paint wastes
in courtyard

Q 16 H
KODAK SAFETY FILM

KS

Photo #: 29 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Drums of unknowns in courtyard

Q 16 H
KODAK SAFETY FILM

KS

Q 16 H
KODAK SAFETY FILM

Q 16 H
KODAK SAFETY FILM



Photo #: 30 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Tanks on west side of tin shed,
contents unknown

0 18 0111
K9

Photo #: 31 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Approximately 100 drums of unknowns in
tin shed

K9

Photo #: 32 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: One of approximately 100 drums
in tin shed - this one was labeled dirty solvent

0 18 0111
K9

000-00000-000

000-00000-000
000-00000-000



SHOCKS V33000 000

North Carolina
1-800-422-4668

Photo #: 33 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: One of approximately 100 drums
in tin shed - this one labeled hazardous waste,
note other open drum

45

Photo #: 34 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: One of approximately 100 drums
in tin shed - this one labeled lab dirts, no good

45

Photo #: 35 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: One of approximately 100 drums
in tin shed - this one labeled hazardous waste

45



SMOKE VERBODEN 000

Verbod (Cigarettes) 4221-4662
4-8300-4221-4662

#36

3/6/91

R9

Steelcote St Louis

Kris Goschen

One of 100 drums in tin
shed - this one labeled "hard"

36A
Photo #: 36 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: One of approximately 100 drums
in tin shed - this one labeled as hard

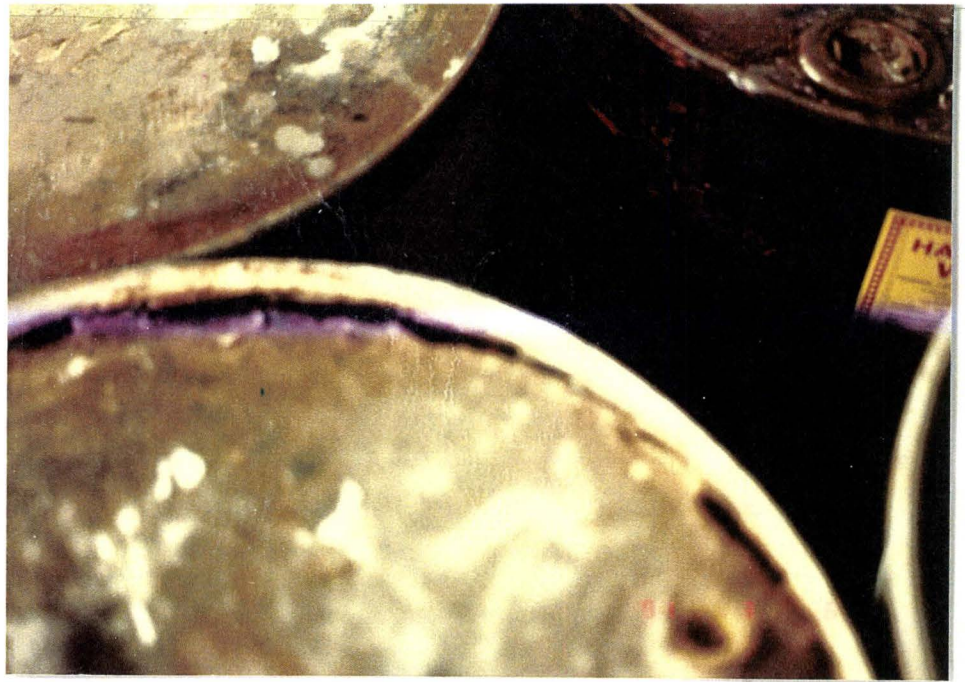
Photo #: 37 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: One of approximately 100 drums
in tin shed - this one open



Photo #: 38 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: One of approximately 100 drums
in tin shed - this one in poor condition

Photo #: 39 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: One of approximately 100 drums
in tin shed - this one in poor condition

Photo #: 40 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: One of approximately 100 drums
in tin shed - this one in poor condition



14

HVM
Appendix
epo

Q 16 HVM
MAR 91 D

129

Photo #: 41 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: One of approximately 100 drums
in tin shed - this one in open condition,
note opened edge

57

Q 17 HVM
Appendix
XTI

Q 16 HVM
MAR 91 D

129

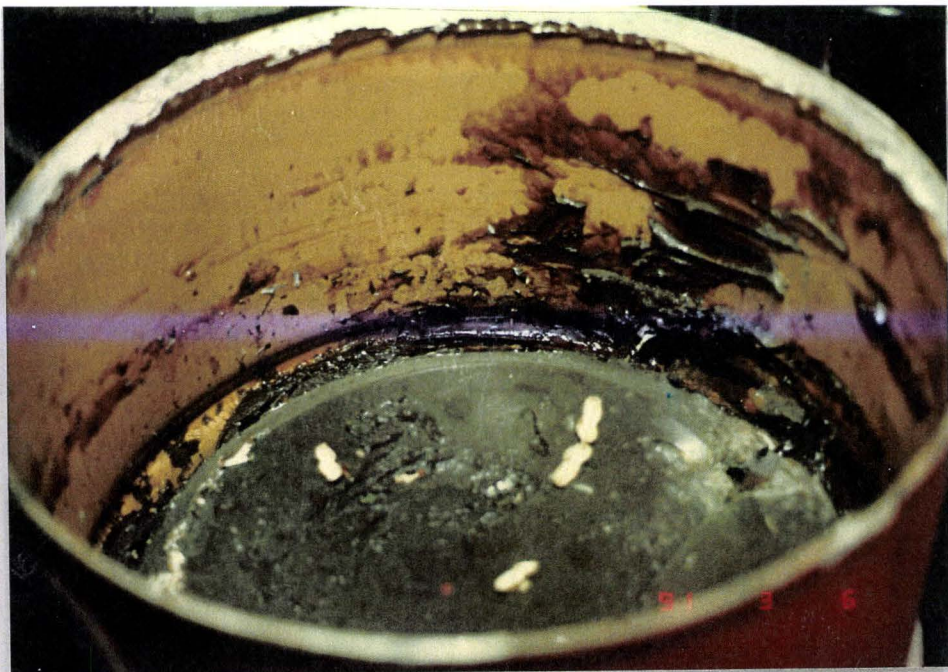
Photo #: 42 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: One of approximately 100 drums
in tin shed - open

53

Photo #: 43 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: One of approximately 100 drums
in tin shed - this one in poor condition

126

3-0334 V8000-033



3-0334 V8000-033



25

Photo #: 44 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: One of approximately 100 drums
in tin shed - this one was open

KG

25

Photo #: 45 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Four of approximately 100 drums
in tin shed - these four were open

KG

25

Photo #: 46 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: One of approximately 100 drums
in tin shed - this one was open

KG

STOCKS 783000-000



2011 Century Master
1-800-441-4162



5N

Photo #: 47 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: One of approximately 100 drums
in tin shed - this one in poor condition

K9

8N

Photo #: 48 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Approximately 50 drums on south side
of tin shed

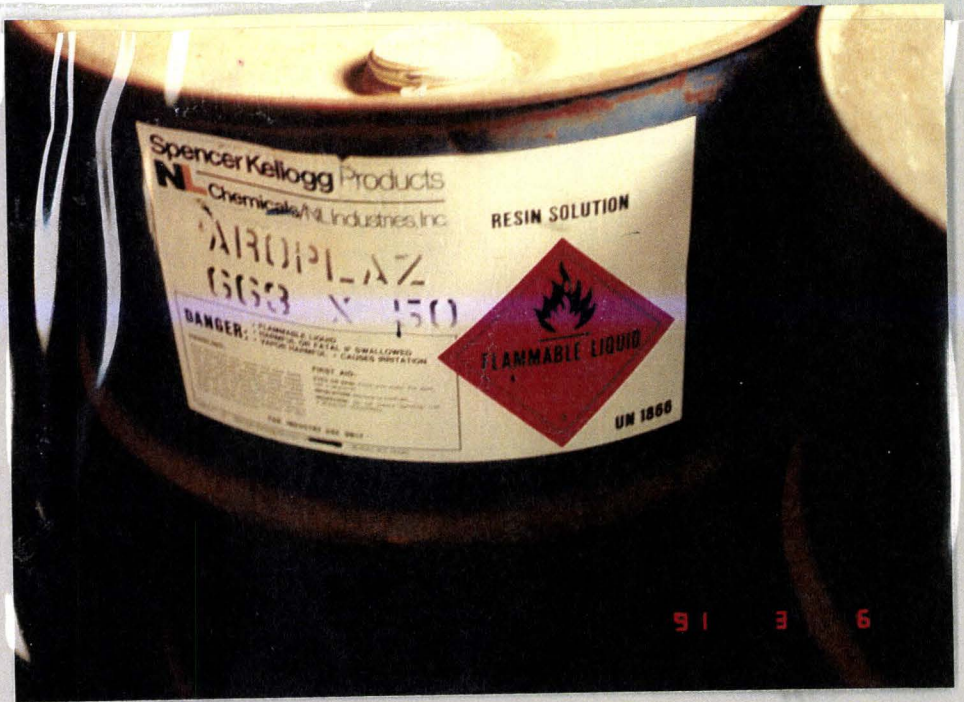
K9

PN

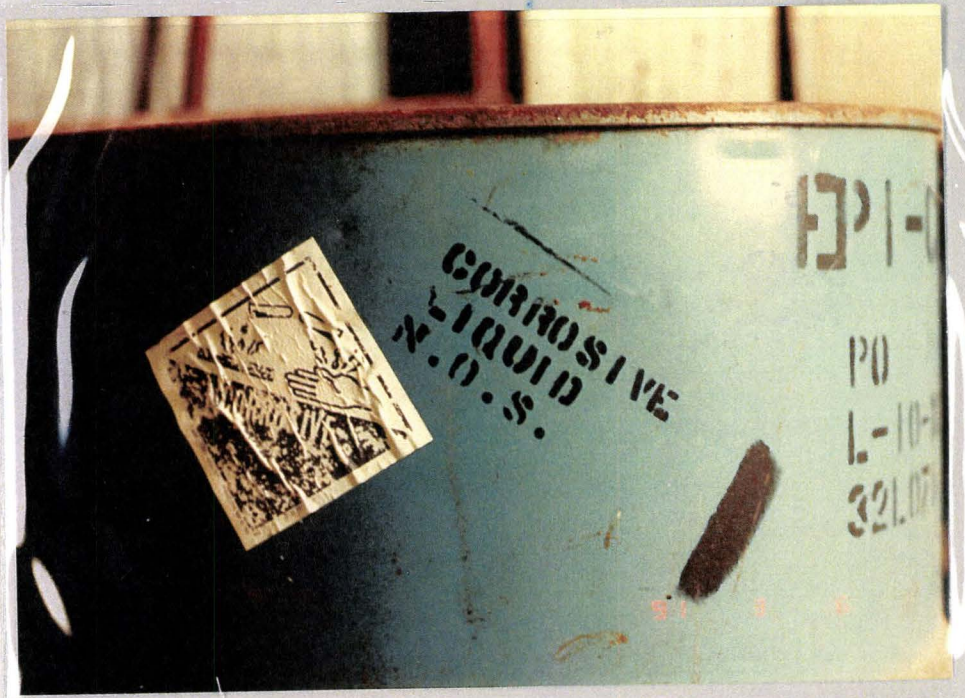
Photo #: 49 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: Approximately 50 drums on the
south side of the tin shed

K9

Stocks 78400-000



9136



9136

2000-157-001-1
1-10-65 1-4232



9136

10

Photo #: 50 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: One of approximately 50 drums on the
south side of the tin shed - this one labeled
flammable liquid

KG

12

Photo #: 51 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: One of approximately 50 drums on the
south side of the tin shed - this one labeled
corrosive

KG

50

Photo #: 52 Date: 3/6/91
Facility: Steelcote Mfg. Co.
Location: St. Louis, MO Inspector: K. Goschen
Comments: One of approximately 50 drums on the
south side of the tin shed - this one labeled
corrosive

KG